

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
NICOLE E. JANOUSEK	:	
Debtor,	:	
	:	Bankruptcy No. 1:17-bk-02516-HWV
PACIFIC UNION FINANCIAL, LLC	:	
Movant,	:	
	:	
vs.	:	
	:	
NICOLE E. JANOUSEK	:	
CHARLES J. DEHART, III	:	
Respondents.	:	

**DEBTOR'S ANSWER TO PACIFIC UNION FINANCIAL, LLC'S MOTION FOR
RELIEF FROM THE AUTOMATIC STAY PURSUANT TO 11 U.S.C. SECTION 362**

AND NOW COMES, NICOLE E. JANOUSEK, Debtor, who, by and through her attorneys, Jacobson & Julius, files her Answer to Pacific Union Financial, LLC's Motion for Relief from the Automatic Stay and in support thereof states as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted in part and denied in part. It is admitted that Debtor is behind in post-petition payments to Movant. It is denied that the amount of the arrearage is as set forth in Movant's Motion. Debtor is hopeful that Movant will allow the Debtor to execute a Stipulation not to exceed six months to cure the arrears or entertain a loan modification.

7. Admitted in part and denied in part. It is admitted that Debtor is behind in post-petition payments to Movant. It is denied that the amount of the arrearage is as set forth in Movant's Motion. Debtor is hopeful that Movant will allow the Debtor to execute a Stipulation not to exceed six months to cure the arrears or entertain a loan modification.

8. Paragraph 8 of Movant's Motion is a conclusion of law which no response is required.

WHEREFORE, Debtor, through counsel, respectfully requests this honorable court deny Movant's Motion and grant any other relief deemed just and appropriate.

Respectfully Submitted,

JACOBSON & JULIUS

s/ Chad J. Julius

Chad J. Julius

ID # 209496

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717.909.5858

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Date: April 13, 2018

CERTIFICATE OF SERVICE

I, Tiffany Ramsey, paralegal with Jacobson & Julius, hereby certify that I have served a copy of the foregoing Answer on the following person(s) by E-Service, addressed to:

JAMES C. WARMBRODT, ESQUIRE
KML LAW GROUP, P.C.
BNY MELLON INDEPENDENCE CENTER
701 MARKET STREET, SUITE 5000
PHILADELPHIA, PA 19106-1532

CHARLES J. DEHART III, ESQUIRE
CHAPTER 13 TRUSTEE
8125 ADAMS DRIVE, SUITE A
HUMMELSTOWN, PA 17036
dehartstaff@pamd13trustee.com; harrisburgect@ramapo.com

U.S. TRUSTEE
228 WALNUT STREET, SUITE 1190
HARRISBURG, PA 17101

Dated: April 13, 2018

s/Tiffany Ramsey
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